

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Case No. 1:23-cv-00423-WO-JLW

TIMIA CHAPLIN, *et al.*, )  
Plaintiffs, )  
v. )  
WILLIE R. ROWE, *et al.*, )  
Defendants. )  
\_\_\_\_\_  
)

**RESPONSE IN OPPOSITION TO  
CLASS CERTIFICATION MOTION**

Defendant The Ohio Casualty Insurance Company (“Ohio Casualty”) joins in and adopts the responses and arguments made by Defendants Willie R. Rowe and Brian Estes in opposition to Plaintiffs’ class certification motion. As surety for Defendants Rowe and Estes, Ohio Casualty’s liability, if any, is wholly derivative of that of Defendants Rowe and Estes and limited to the penal sum of Ohio Casualty’s bonds.

This the 8th day of January, 2024.

/s/Frederick M. Thurman, Jr.  
Frederick M. Thurman, Jr.  
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Attorneys for Defendant  
*The Ohio Casualty Insurance Company*

## CERTIFICATE OF SERVICE

The undersigned does hereby certify that the foregoing has been served via the Court's online filing system on all counsel of record.

This the 8th day of January, 2024.

/s/Frederick M. Thurman, Jr. \_\_\_\_\_

Frederick M. Thurman, Jr.

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